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January 15, 2020

Via ECF

The Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (AMD)
(Development Group of NYP, LLC)

Dear Judge Donnelly:

We represent Development Group of NYP, LLC. On December 23, 2019, Your Honor entered a Scheduling Order (by docket entry) for our Petition with regard to the forfeiture of 304 Fifth Avenue. Pursuant to that Order, on Friday, January 10, 2020, the U.S. Government filed a response to our Petition. Your Order provides us seven days (to January 17, 2020) to respond.

It is our intention to file a response, however, lead counsel Cathy Fleming had an unfortunate death in her family yesterday. As a result, we had a conversation with AUSA Brian Morris in which he consented to an extension until Friday, January 24, 2020, for us to file a response.

We respectfully request that the Court grant us until Friday, January 24, 2020, to file a response to the Government's filing.

Respectfully submitted,

/s/Harold J. Ruvoldt
Harold J. Ruvoldt

cc: AUSA Brian D. Morris